

Appln No. 10/659,023
Amdt. Dated May 11, 2006
Response to Office Action of March 8, 2006

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REMARKS/ARGUMENTS

The Office Action has been carefully considered. It is respectfully submitted that the issues raised are traversed, being hereinafter addressed with reference to the relevant headings appearing in the Detailed Action section of the Office Action.

The Applicant has amended claims. The Applicant respectfully submits that the amendments to the claim set are fully supported by the originally filed specification.

Claim 1 has been amended to recite the feature of "a print media feed apparatus configured to receive separate sheets of print media and to pass the separate sheets past a printhead" and to require that "the printhead is positioned on the support structure to carry out a printing operation on at least one sheet of print media". Support for this amendment can be found by reference to page 5, line 31 to page 6, line 19 of the specification. This section discusses a print media feed apparatus 20 which operates on print media 30, preferably in the form of business card sized paper or card sheets fed through entry slot 31 in external casing 32. Card 30 is picked up by powered entry feed rollers 23 and delivered to the printhead an ink supply module 16.

Claim Rejections - 35 USC §103

The Examiner has rejected claims 1 - 7 under 35 USC 103(a) as being unpatentable over Kumar (US 5,294,782) in view of Allard (US 5,615,384). The Applicant respectfully submits that the present application is patentable over Kumar in view of Allard.

The Applicant has introduced the feature of "a print media feed apparatus configured to receive separate sheets of print media and to pass the separate sheets past a printhead" into currently amended claim 1. This feature is neither disclosed nor suggested in either Kumar or Allard, or a combination of these cited documents. Allard is totally silent on a printing mechanism. Kumar only discloses and discusses printer 90 that uses a roll of printer paper 96 (col 5, lines 1 - 5). Kumar does not disclose or suggest a printing mechanism able to receive a separate sheet of print media and to pass the separate sheet of print media past a printhead. Such a feature requires a wholly different mechanism to that taught in Kumar.

Furthermore, the Examiner asserts that although Kumar does not expressly disclose a speaker and microphone arrangement, Kumar and Allard are combinable and Allard discloses a speaker and microphone arrangement. The Applicant respectfully disagrees that Kumar and Allard can be combined.

The Applicant respectfully submits that a *prima facie* case of obviousness has not been established to shift the burden of rebuttal to the Applicant (MPEP 2143). In particular, the Office Action fails to point out any suggestion or motivation to modify Kumar in view of Allard. Additionally, the Office Action in this case fails to identify why the proposed prior art would have any reasonable expectation of success in producing the invention as recited in claim 1.

There are three possible sources for providing a motivation to combine references. These are the nature of the problem to be solved, the teachings of the prior art, and the knowledge of persons skilled in the art. On page 3 of the Office Action, the Examiner has stated that Kumar and Allard are combinable because they are from the same field of endeavour. The

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Applicant respectfully disagrees with the Examiner's assertion. Kumar and Allard are submitted to be concerned with different fields of endeavour.

In particular, the Field of Invention section in Kumar describes (col 1, line 6 - 16):

"The present invention relates in general to portable devices for data collection. More particularly, the present invention pertains to devices for transacting credit card sales as portable, hand held point of sale terminals. More specifically, the present invention relates to devices which provide all functions necessary for processing a credit card sales transaction remote from a conventional checkout register, including a credit card reader, data entry keyboard, barcode scanner, display, receipt printer, transaction approval communicator and controlling processor."

In contrast to Kumar, Allard describes that it is an object of the invention to provide improved zoom and pan functions for a mobile, hand held personal communicator having a small touch screen display actuated in response to being touched by a user's finger (col 2, lines 25 - 28). Thus, Allard is directed to an improved touch screen user interface for mobile devices.

It is submitted that Kumar and Allard are not combinable as Kumar is concerned with Point of Sale (POS) systems, whereas Allard is concerned with touch screen displays. Moreover, it is submitted that the nature of the problem to be solved is completely different in Kumar and Allard.

Kumar describes that as there has been an increased desirability of hand held POS terminals, there is no such terminal that allows for the commercial transaction to be completed at a location remote from stationary POS terminals, while simultaneously arranging components to facilitate hand held use (see col 2, lines 4 - 10). Thus, Kumar aims to solve the problem of providing POS terminals that solve this problem.

In contrast, Allard addresses the requirement to provide a zoom function used to magnify areas of a graphics display, such as a fax image, and to provide a pan function where the entire display screen acts as a window or mask over the image (col 2, lines 41 - 53).

Thus, Kumar and Allard are directed to solving completely different problems. Neither Kumar or Allard teach or suggest the desirability of the combination, most especially in relation to a combination that would provide "a speaker and microphone arrangement" or "a print media feed apparatus configured to receive separate sheets of print media" as required in currently amended claim 1. Thus, a person skilled in the art of Kumar, would not contemplate a combination with the system of Allard.

Therefore, the Applicant respectfully submits that as the fields of endeavour of Kumar and Allard are completely different, and the nature of the problems to be solved are completely different, and there is no desirability to combine the teachings of Kumar and Allard, a person skilled in the art would not be motivated to combine Kumar and Allard.

Furthermore, the alleged combination, to arrive at claim 1, would require a significant technical reworking of Kumar and Allard. It will be appreciated by the Examiner that significant re-engineering of the POS terminal of Kumar would be required which could only be achieved with the benefit of hindsight. The Applicant submits there would be no

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reasonable expectation of success in combining Kumar and Allard and there is no *prima facie* case of obviousness.

Nevertheless, as previously discussed, the Applicant has amended claim 1 to more clearly distinguish the cited documents. The Applicant respectfully submits that currently amended claim 1 is patentable in light of the cited documents, if combined, and respectfully requests the rejection to be withdrawn, and the application to be favourably reconsidered.

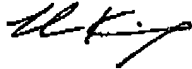
In view of the foregoing, it is respectfully requested that the Examiner reconsider and withdraw the rejections. The present application is believed to be in condition for allowance. Accordingly, the Applicant respectfully requests a Notice of Allowance of all the claims presently under examination.

Very respectfully,
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